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Attorneys for Defendant TRANSAMERICA  
LIFE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JACKLYN G. RIGGS, an individual,  
  
Plaintiff,

vs.

TRANSAMERICA LIFE  
INSURANCE COMPANY, DOES I-  
XXX; AND ABC CORPORATIONS  
A-Z, inclusive,  
  
Defendant.

Case No. 3:22-cv-00124-LRH-CLB  
State Court Case No. CV22-00153

**DEFENDANT TRANSAMERICA  
LIFE INSURANCE COMPANY'S  
COURT ORDERED  
STATEMENT REGARDING  
REMOVAL**

Complaint Filed: January 31, 2022  
Removed: March 8, 2022

Defendant Transamerica Life Insurance Company ("TLIC") respectfully submits this Statement Regarding Removal from the Second Judicial District Court of the State of Nevada, Washoe County, to the United States District Court for the District of Nevada, Reno Division, as required by the Court's Order dated March 9, 2022 and signed by The Honorable Larry R. Hicks, U.S.D.J (the "Order"):

STATEMENT REGARDING REMOVAL

1           1.     Transamerica was served with the Complaint on February 11, 2022.  
2           2.     Transamerica was served with the Summons on February 11, 2022.  
3           3.     No Defendant in this action is a citizen of Nevada. Jacklyn G. Riggs  
4 (“Plaintiff”) is a citizen of Nevada. TLIC is a corporation organized and existing  
5 under the laws of the State of Iowa with its principal place of business and “nerve  
6 center” in Cedar Rapids, Iowa, and is therefore deemed to be a citizen of the State of  
7 Iowa. As set forth in Plaintiff’s Complaint, she is seeking an award of damages for  
8 past policy benefits (\$33,439.26); emotional distress damages; statutory treble  
9 damages; punitive damages; and attorney’s fees. The past policy benefits are  
10 demonstrated by the Policy Schedule and terms, as well as the Declaration of  
11 Courtney Wunderlich. These documents were previously attached to TLIC’s Notice  
12 of Removal. The case law cited in TLIC’s Notice of Removal, which is incorporated  
13 herein by reference, demonstrates that an award for damages for emotional distress;  
14 punitive damages; and attorney’s fees would be reasonably likely to materially exceed  
15 the jurisdictional threshold of \$75,000 even before such an award is aggregated with  
16 the trebled past policy damages.<sup>1</sup>

17           4.     TLIC filed its removal within 30 days of its receipt of the Summons and  
18 Complaint.

19           5.     Paragraph 5 of the Order is inapplicable to this lawsuit, which was  
20 commenced less than one year prior to the date of TLIC’s removal.

21           6.     TLIC is not aware of any other Defendant that was served before the  
22 Notice of Removal was filed.

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27 <sup>1</sup> Notwithstanding that the amount placed in controversy by Plaintiff materially exceeds the  
28 \$75,000 threshold for removal, TLIC denies that Plaintiff is entitled to any measure of relief.  
Nothing herein shall constitute an admission or waiver of any right, claim or defense by TLIC, all  
of which are expressly reserved.

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Respectfully submitted,

DATED: March 22, 2022

COZEN O'CONNOR

By: /s/ Karl O. Riley

Karl O. Riley  
Michael Rafalko  
(*Pro Hac Vice to be filed*)  
Kathryn Rivera  
(*Pro Hac Vice to be filed*)

Attorneys for Defendant  
TRANSAMERICA LIFE  
INSURANCE COMPANY